

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

ANGELICA WOODS,)
)
Plaintiff,)
)
v.) Case No. 4:21-CV-00462-CDP
)
CITY OF ST. LOUIS, MO, et al.,)
)
Defendants.)

MOTION FOR LEAVE TO WITHDRAW AS COUNSEL FOR PLAINTIFF

COMES NOW Movant, Lynette M. Petruska, on behalf of Pleban & Petruska Law, LLC as attorneys for Plaintiff, and pursuant to Missouri Supreme Court Rule 4-1.16 requests leave to withdraw as counsel for Plaintiff Angelica Woods in the above-referenced matter and in support of this motion states as follows:

1. This case is not yet scheduled for trial. A Rule 16 Order was issued on December 9, 2021 directing the parties to file a Joint Proposed Scheduling Plan by January 14, 2021.

Undersigned counsel has requested an extension of time for the filing of the Joint Proposed Scheduling Plan and a continuance of the Scheduling Conference so that this motion can be resolved before a scheduling order is entered.

2. Movant requests leave to withdraw from representing Plaintiff because certain issues have arisen such that future representation is no longer possible and professional considerations require termination of the representation.

3. Movant has informed Plaintiff of the issues set forth in paragraph 2 and has advised Plaintiff of her and the firm's intention to withdraw from this case.

4. Withdraw can be accomplished without material adverse effect on the interests of the client because this case is in the beginning stages, no Case Management Order or

trial date has been set, and therefore, Plaintiff will have adequate time to secure new counsel who can represent Plaintiff free of the issues that have required undersigned to seek leave to withdraw.

WHEREFORE, Pleban & Petruska Law, LLC, through Lynette M. Petruska, respectfully requests leave to withdraw as counsel for Plaintiff Angelica Woods in the above-referenced matter and for such other and further relief as this Court deems appropriate under the circumstances.

Respectfully submitted,

PLEBAN & PETRUSKA LAW, LLC

by: _____ /s/ Lynette M. Petruska

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Certificate of Service

The undersigned hereby certifies that on this 17th day of December 2021, a true and accurate copy of the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon counsel of record. A copy of this motion was also served by email and regular mail on December 17, 2021 upon Plaintiff Angelica Woods, 5947 Plymouth Ave., St. Louis, MO 63112.

_____ /s/ Lynette M. Petruska _____